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ALEXANDER L. STEVAS,
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Nos. 82-206 and 82-229

IN THE

Supreme Court of the United States

OCTOBER TERM, 1983

FIREFIGHTERS LOCAL UNION NO. 1784,

Petitioner,

—vs.—

CARL W. STOTTS, et al.,

Respondents.

ON WRITS OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

BRIEF FOR THE NATIONAL BLACK POLICE ASSOCIATION, and AMERICAN CIVIL LIBERTIES UNION, *AMICI CURIAE*

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INTEREST OF AMICI*

The National Black Police Association ("NBPA") is a nationwide organization comprised of 85 local black police associations representing more than 20,000 black police officers throughout the United States. The American Civil Liberties Union ("ACLU") is a nationwide, nonpartisan organization of over 250,000 members dedicated to protecting the fundamental rights of the people of the United States.

Because of the NBPA's and ACLU's commitment to eradicating and remedying the continuing effects of longstanding discrimination against racial minorities, the NBPA and the ACLU, amici curiae, filed a Brief in support of Respondents in Boston Firefighters Union, Local 718 v. Boston Chapter, NAACP, 103 S.Ct. 2076, 76 L.Ed.2d 330 (1983). For the same reasons, amici file this Brief in support of

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* The parties have consented to the filing of this Brief, and their letters of consent have been lodged with the Clerk of this Court under Rule 36.2 of the Rules of this Court.

Respondents and urge this Court to affirm the judgment of the Sixth Circuit.

ARGUMENT

In our Brief Amici Curiae filed in Boston Firefighters Union, Local 718 v. Boston Chapter, NAACP, 103 S.Ct. 2076, 76 L.Ed.2d 330 (1983), we argued that the trial court was empowered to modify the consent decreee to conform it to unanticipated circumstances; that the modified consent decree violated neither Title VII nor the equal protection clause; and that, if the case were viewed solely from the perspective of economic loss, the employer was required to bear any economic burdens flowing from the initial consent decree.

The facts, issues, and legal arguments in this case are similar to and in many respects identical to those in Boston Firefighters. We accordingly incoporate by reference the Brief of the NBPA and ACLU in Boston Firefighters, and reassert those arguments here.

CONCLUSION

This Court should affirm the judgment of the court below.

Respectfully submitted,

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